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ATTORNEY DOCKET NO
1300-SW-C2PATENT
U.S. 10/799,831**Remarks/ Arguments**

In response to the Office Action mailed December August 17, 2006, Applicants respectfully request that the Examiner reconsider the rejections of the claims.

Claims 57 – 76 remain.

Claims 57 and 67 are being amended.

Claims 1 – 56 have been cancelled.

Claims 57 – 59, 61, 63 – 69, 71, and 73 – 76 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Hare et al.* (U.S. Patent 6,084,638) (hereinafter "the *Hare* reference"). Applicants respectfully traverse these rejections.

Anticipation rejections under 35 U.S.C. § 102(e) require identity of invention. In other words, each and every feature of each and every claim rejected as anticipated must be disclosed in a single prior art reference. The *Hare* reference does not teach a system in which digital commands are transmitted across a digital wireless link for conversion at the receiving terminal into National Television System Committee (NTSC) or Phase Alternating Line (PAL) standard signals to compose a presentation.

The system disclosed in the *Hare* reference is almost precisely identical to the prior art described in the present application in Figure 3 and the corresponding text beginning in the first paragraph on Page 5. Specifically, in such prior art systems, data generated either by the PC Operating System or any of the input devices (i.e. keyboard, mouse, or joy stick) is converted into an analog (NTSC or PAL) signal which is transmitted to the television receiver.

The *Hare* reference also mentions, at Column 4, Lines 25-38, that PC Video (RGB) data can also be transmitted to a television receiver, where those data are converted into a scanned format such as NTSC or PAL. Again, RGB data by definition are not instructions or commands, but instead are the raw Red (R), Green (G), and Blue (B) data defining each pixel. The principles of the present invention are also directed at

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avoiding RGB data transmission, as stated in the third paragraph on Page 43 of the present application.

There is a fundamental difference between "data" and "commands." IEEE Standard 100 provides several definitions for the term "command". Generally, commands are expressions that can be input into a system to initiate an action or affect the execution of a computer program. Similarly, when instructions are decoded in a processing system, commands initiate the steps that define the process of executing operations. In contrast, NTSC and PAL signals transmit raw luminance and chrominance data, along with timing signals (e.g. the color burst) which are rastered as pixels onto the TV screen to generate images. NTSC and PAL signals are clearly not commands.

Furthermore, the system disclosed in the *Hare* reference suffers from exactly the same problems that the principles of the present invention alleviate. As specifically stated in the second and third paragraphs of Page 5 of the present application, when a TV presentation is composed on a computer in the RGB format, converted into analog NTSC or PAL signals, and then transmitted to a TV for display, the quality of the TV presentation deteriorates. Additionally, the system of converting RGB data to NTSC or PAL data is computationally expensive.

With further regards to the input devices of the *Hare* reference, for example the keyboard, the mouse and the joystick, there is no teaching or suggestion that these control signals are either transmitted to the TV or are used to compose an audio-video presentation.

Applicant also notes that the excerpt cited by the Examiner at Column 2, Lines 29-35 of the *Hare* reference discusses disposing an extender system at the TV receiver which allows user commands to be transmitted *from the TV to the PC*. In addition to being in the reverse transmission direction, there is no teaching or suggestion that these commands are in any way used to compose a presentation

In sum, in the *Hare* reference, whether RGB data or NTSC/PAL data are being transmitted from the PC to the TV, all the information required to define each pixel on

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the display presentation is being transmitted. No commands or instructions are ever transferred between the PC and the TV.

Given the substantial differences between Claims 57 – 59, 61, 63 – 69, 71, and 73 - 76, and the teachings of the *Hare* reference, Applicants respectfully submit that the Examiner has not met his burden of proving a *prima facie* case of anticipation, and therefore that the rejections of Claims 57 – 59, 61, 63 – 69, 71, and 73 - 76 should be withdrawn.

Claims 60, 62, 70, and 72 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the *Hare* reference, in further view of *Smyers et al.* (U.S. Patent 6,233,637) (hereinafter "*Smyers* reference"). Applicants respectfully traverse these rejections.

The differences between the *Hare* reference and the present claims have been described in detail above. These differences are not remedied by the teachings of the *Smyers* reference. In particular, similar to the *Hare* reference, the *Smyers* reference does not teach or suggest transforming digital data transmitted over a wireless link at a display appliance into a format suitable for generating a display. The *Smyers* reference only discloses a bus-based system, and furthermore, does not disclose any type of display appliance.

Applicants therefore respectfully submit that the rejections of Claims 60, 62, 70, and 72 as obvious in view of the *Hare* and *Smyers* references should be withdrawn.

No new matter has been added; the claims have been merely amended to more particularly claim the subject matter Applicants believe is inventive. Applicants respectfully submit that the Claims as they now stand are patentably distinct over the art cited during the prosecution thereof.

With the addition of no new claims, no additional filing fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account Number 20-0821 of Thompson & Knight LLP.

If the Examiner has any questions or comments concerning this paper or the present application in general, the Examiner is invited to call the undersigned at (214) 969 - 1749.


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